

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MM Docket No. 95-141

DOCKET FILE COPY ORIGINAL

In re)
)
Amendment of Section 73.202 (b)) RM-8642
Table of Allotments)
FM Broadcast Stations)
(Frederiksted, Virgin Islands))

To: The Chief, Allocations Branch

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OPPOSITION

Jose J. Arzuaga ("petitioner"), by his counsel, herewith submits his opposition to the REQUEST FOR WAIVER OF DEADLINES AND FOR ACCEPTANCE OF LATE-FILED COMMENTS (filed November 27, 1995) submitted by International Broadcasting Corporation ("IBC"), licensee of FM broadcast station WAHQ-FM, Carolina, Puerto Rico in the above-captioned proceeding. In support whereof, the following is stated:

1. On August 31, 1995, the Commission released its NOTICE OF PROPOSED RULE MAKING in the above-captioned proceeding, setting October 23 as the date for filing Comments and November 7 as the date for filing Reply Comments, neither of which deadline was met by IBC. The notice was properly published, and IBC had constructive notice of the proposed changes in the FM Table of Allotments. As will be further discussed, *infra*, IBC had actual notice of the Arzuaga proposals, which were served on IBC. So this matter comes as no surprise to IBC. Further, IBC's complaint that it was

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not properly served with the counterproposal herein is at best a technicality designed to deflect attention from the merits of this case and its failure to meet the filing deadlines.

Untimely Reconsideration Request

2. It is noted and emphasized here that the Commission stated in the NPRM, at f.n. 2:

....We note that Station WAHQ(FM), Channel 299B, Carolina, Puerto Rico, has an application (BPH-950509ID) pending to modify its transmitter site which conflicts with the instant proposed rule making. However, where an application and an earlier or simultaneously filed petition for rule making conflict, and the conflict cannot be resolved by a site restriction or the allotment of an alternate channel, the application will be held in abeyance pending the outcome of the rule making. *See Conflicts Between Applications and Petitions for Rule Making to Amend the FM Table of Allotments*, 8 FCC Rcd 4743 (1993).

3. No timely request for reconsideration was filed in connection with this ruling, and it is the law of the case. Nevertheless, in its REQUEST FOR WAIVER OF DEADLINES AND FOR ACCEPTANCE OF LATE-FILED COMMENTS, IBC seeks reconsideration of the Commission's ruling in the NPRM. As a request for reconsideration, Section "B" of IBC's pleading (pp. 3- 6 and Engineering Statement) is grossly untimely and must be stricken. Administrative finality requires rejection of this effort to submit a petition for reconsideration which is nearly 60 days late. In addition, the portion of the Engineering Statement which sets forth alleged alternate channels for Frederiksted must be stricken as an untimely counterproposal.

4. Even if the Commission were not to strike the belated effort at reconsideration, IBC's arguments must be denied on the merits. As acknowledged in IBC's pleadings (at p. 3), Arzuaga clearly set forth his proposals which are being advanced in this rulemaking proceeding in his reply comments in RM-8026. These were filed January 19, 1993,

certainly well in advance of IBC's modification application filed in May of this year. Moreover, this pleading was served by the undersigned on John P. Bankson, Jr., Esq. in his capacity as counsel for WAHQ (then WVOZ-FM). Accordingly, IBC was apprised of Arzuaga's proposal nearly three years ago. IBC had actual knowledge of the proposal for nearly three years, and its protestations of lack of notice are hardly persuasive. In fact, it is IBC which has failed to provide notice. When IBC filed its application in May of 1993, RM-8026 was still an active proceeding; and IBC should have served Arzuaga with a copy of its conflicting application. Therefore, IBC hardly comes with clean hands, and its arguments of lack of notice are not supported by the facts.

5. IBC's argument that Arzuaga's proposal should be counted as filed as of the date of the NPRM defies logic and has no basis in law. It is the date of the filing of the pleading and not the date of the NPRM which establishes cut-off protection under the Commission's report and order in *Conflicts Between Applications and Petitions for Rulemaking to Amend the FM Table of Allotments*, 7 FCC Rcd. 4917 (1992), *clarified*, 8 FCC Rcd. 4743 (1993). The fact that the pleading was defective as a counterproposal is immaterial to the issue at hand. There is no question that Arzuaga could have filed the pleading as a rulemaking petition, and the Commission treated it as such. It was the 1993 pleading which set forth the Arzuaga proposal (including the substance of the Arzuaga counter-proposal herein), and it is the 1993 pleading which establishes Arzuaga's cut-off rights. There simply is no basis, in law or logic, for establishing cut-off rights at the time of issuance of the NPRM. This argument must fail both as an untimely request for

reconsideration of the Commission's ruling in the NPRM and as an attempt to make new law which is without precedent or logical basis.

6. Perhaps realizing that its argument is unwarranted as a matter of law, IBC pleads (at p. 6) that the Commission's action here is "unfair." Of course, part of the unfairness argument is based on the alleged lack of notice at the time the IBC application was filed. As discussed above, the alleged lack of notice is a myth. IBC's counsel was served with the 1993 proposal and thus IBC had more than ample notice. Not only is the argument based on myth, it is based on the incredible argument that there is "no harm" to Arzuaga if he is required to file a new rulemaking whereas the harm to IBC is "great" if Arzuaga is permitted to prosecute his proposal. The opposite, of course, is true. All Arzuaga is being afforded is cut-off rights so that the Commission can determine which proposal best serves the public interest. His proposal has not been afforded preference (despite having been filed several years earlier) - only the right to be considered. In contrast, if the Commission required Arzuaga to file over again, IBC would be protected without any consideration being given to Arzuaga's proposal. Fairness dictates a denial of this belated reconsideration effort - not the opposite result advocated by IBC.

7. Next, at p. 5, IBC argues that the grant of its application will better serve the public interest, based on certain engineering arguments advanced. This constitutes not only an untimely counter-proposal but a mythical one as demonstrated in the attached Engineering Statement. Neither alternate channel is available. Ch. 222 is not available as suggested because it is currently in use in Tortola, and both channels require the use of a site which is precluded by the airport and oil refinery. In contrast, WAHQ can achieve

maximum facilities at locations which are not short-spaced to the Arzuaga proposal. As demonstrated in the attached Engineering Statement, sites are available which would provide better coverage to more people. Further, these sites are existing antenna farms whereas the El Yunque site is in an environmentally sensitive area where governmental approval is not likely to be obtained. In short, it is WAHQ which has alternatives (which are superior) and not Arzuaga.

8. As a final effort to derail the Arzuaga proposal, IBC argues that Arzuaga has not indicated his intention to apply for the Frederiksted allocation if granted. This simply is not true. In para. 3 of his COMMENTS AND COUNTERPROPOSAL OF PETITIONER, Arzuaga stated that "if the Commission assigns the proposed frequency to Frederiksted and/or Culebra, petitioner will apply for the authorization to construct and operate an FM station in Frederiksted and/or Culebra." The operative conjunction is "and/or." If Arzuaga had intended that he would only apply if both were approved, he would have said "and" not "and/or." The clear intention was to include the possibility that only the Frederiksted allotment would be made, and Arzuaga once again reiterates that he will promptly apply for Ch. 298 in Frederiksted if assigned as proposed in the NPRM.

Untimely Comments

9. As part of its request for waiver of deadlines, IBC seeks to have the Commission consider its untimely COMMENTS IN OPPOSITION AND IN REPLY TO COMMENTS AND COUNTERPROPOSAL OF PETITIONER. This pleading was filed November 13, 1995, a week after the due date for "reply comments." These comments should be stricken as untimely and, if considered, denied on the merits. IBC begins by

asserting that "IBC has not been a party to these proceedings until now." However, this is misleading. As discussed above, the proposals contained in this rulemaking were served on WAHQ in 1993. Further, the Commission noted the conflict with WAHQ's modification application in the NPRM and presumably the Commission's engineering data base noted the conflict, making the connection a matter of public record. Even if IBC had not been diligent in reviewing the NPRM, the conflict should have been discovered through a routine status check on the pending WAHQ application.

10. In any event, IBC argues (p. 3) that IBC was not properly served with Arzuaga's counterproposal. Of course, as discussed above, IBC was served with the essence of the counterproposal some three years ago. Further, the alleged failure to serve is based on a technical argument that service on the party operating the station was insufficient. Service was effectuated by undersigned counsel utilizing the station address published in the Broadcasting & Cable Yearbook 1995. IBC does not deny that the pleading was ultimately delivered to the alleged owner of IBC, but argues that it was delayed due to the use of the address published in the Yearbook.

11. IBC goes on to state that "Arzuaga knew about WAHQ's ownership and address," implying that Arzuaga should have known better than to send the document to Pienbenedio Rodriguez. The fact is that it was undersigned counsel who effectuated service not Arzuaga, and counsel utilized the Yearbook because he was unable to contact Arzuaga to verify the address. However, counsel has since discussed the issue with Arzuaga (who IBC correctly points out does know about WAHQ's ownership) and who confirms that Pienbenedio Rodriguez is in control of the station and not Pedro Roman

Collazo. While IBC may argue that it is merely leasing the station pursuant to an LMA,¹ the fact is that the pleading was served on the person who is operating the station,² and it appears to be IBC's failure to maintain proper control over the facility rather than Arzuaga's failure to effectuate service which led to the problem facing IBC. It would indeed be ironic if the Commission were to excuse IBC's tardiness due to the relinquishment of control by IBC.

12. In any event, IBC admits that the pleading was ultimately received but that "little time was left for a reply." This statement begs the question. If IBC had "little time" left for a reply, it was at least incumbent on it to seek an extension of time prior to the deadline rather than simply coming in a week late without so much as an explanation as to why a timely extension request was not sought. This is not merely a case of tardiness. It is a case of unexcused tardiness which should not be permitted. Here the Commission should once again bear in mind that IBC had ample notice of what was being proposed by Arzuaga - but it has simply slept on its rights (perhaps due to the fact that control had been relinquished to Pienbenedio Rodriguez).

13. Even if considered, IBC's remarks are without merit. In para. 2 of its pleading, IBC states that in proposing alternative 1 of Arzuaga's counter-proposals, the Commission implicitly rejected the counterproposal. This is not the case. The Commission explained in its Report and Order in MM Docket No. 92-245, para. 4 and f.n. 7, that because WAHQ had withdrawn its request for substitution of Channel 300B for

¹ It appears that control of the station has been relinquished to an alien, which would not be a proper use of an LMA in any event.

² No IBC employee is listed at the station address and to Mr. Arzuaga's knowledge there are no IBC employee's at the station. The person listed as President was served.

Channel 299B, Arzuaga was required to reimburse WAHQ and had failed to state his willingness to do so. The Commission pointed out that this was not the fault of Arzuaga - rather a technicality due to the withdrawal of the WAHQ channel change. Clearly, the Commission did not reject the proposal on the merits but merely on a technicality which was cured by Arzuaga in his timely-filed counter-proposal in this proceeding.

14. The next misstatement of the facts submitted by WAHQ is the allegation that Arzuaga has waffled on what he wants, and the Commission has no way of relying on what proposal he intends to advance. This is certainly a case of the pot calling the kettle black. The Commission should bear in mind that it was originally WAHQ which proposed to move from Ch. 229 to 300 and then subsequently withdrew its request. It is amazing that WAHQ is arguing that a proposal which it once advanced is now highly disruptive and contrary to the public interest. Who is it that is doing the waffling? The fact is that Arzuaga modified his original proposal due to conflicting proposals made by others. However, since 1993 his proposal has remained the same. He has consistently proposed the assignment of a new FM station in Frederiksted and a new FM station in Culebra, resulting only in the adjacent channel move of WAHQ, which WAHQ had itself requested. These were presented in the alternative due to the fact that if the Commission does not agree to assign a new FM station to both Frederiksted and Culebra, Arzuaga would still want the station in Frederiksted. This is simple, concrete, understandable and consistent - as contrasted with WAHQ's former inconsistent proposal that a change of its channel as proposed by Arzuaga herein would be in the public interest. How was it in the public interest when WAHQ proposed it but not when Arzuaga proposes it. Moreover, as

discussed in the attached Engineering Statement, WAHQ has previously obtained construction permits near the El Yunque site but has permitted those permits to expire. Given the fact that WAHQ has had the opportunity to improve its facilities previously but never acted on those opportunities and the fact that the presently proposed site is in an area where governmental approval is very unlikely, one can only speculate as to WAHQ's real agenda in these proceedings.

15. In summary, Arzuaga has not changed his basic proposal in his counterproposal. He sought the Culebra channel in the pleading which led the Commission to issue the NPRM in this proceeding. The Commission did not include that portion of the proposal due to the technicality resulting from WAHQ's withdrawal of its proposed channel change which unbeknownst to Arzuaga required the filing of a statement that he would reimburse WAHQ if the change was effectuated. Arzuaga has merely retendered his previous proposal with the required statement and a slight modification. This is what he has sought all along. He has not changed. WAHQ is the only party which has changed, now arguing that the channel change which it once sought as being in the public interest is now mysteriously contrary to the public interest - a curious position at best from one who accuses others of "waffling."

Counterproposal

16. The final issue to be considered is IBC's argument that Arzuaga's counterproposal is cut-off (Section A, pp. 2,3 of Request for Waiver). The argument here is that IBC's May 9, 1995 application to relocate its transmitter serves to cut-off the later-filed counter-proposal in this proceeding. While IBC's statement of the law is accurate,

its application of the law to this case is wrong. As discussed above, the Commission has already ruled that the IBC application must be held in abeyance pending outcome of the instant rulemaking proceeding. The rulemaking request was initiated prior to the application; therefore, the application does not serve to cut-off the conflicting proposals being advanced in this proceeding. If IBC disagreed with the Commission's ruling, it was required to request reconsideration of the ruling within the time limits prescribed in the Commission's rules. It is too late now to argue that the Commission's ruling should be modified. The counter-proposal does not set forth a "new conflict" to the IBC application. The conflict already exists, and there is no reason for affording IBC protection against the counter-proposal when its application is already in conflict with the NPRM proposal. While this rationale may constitute "good advocacy" on the part of IBC, it does not serve as a legitimate basis for decision-making in this proceeding.

17. Furthermore, the counter-proposal set forth by Arzuaga was essentially a part of his original pleading which led to the NPRM with modifications which have no bearing on the "cut-off" rights pertinent to this proceeding. The proposal advanced by Arzuaga in his pleading which led to issuance of the NPRM included a request for allotment of Ch. 298A to Culebra, requiring WAHQ to be moved from 299B to 300B and allocating 299A to Frederiksted.³ Arzuaga modified this proposal slightly by upgrading the Culebra allocation to 298B1 and the Frederiksted allocation to 293B. Either proposal requires the move of WAHQ to 300B. For purposes of cut-off rights, this proposal was advanced together with the 1993 proposal to allocate 298B1 to Frederiksted (as alternative

³ Since the original request sought the allocation to Culebra, the counter-proposal should not be viewed as an attempt to introduce a new community in a counter-proposal. Rather, Arzuaga merely conformed his original proposal to the requirement that he reimburse WAHQ for expenses.

proposals). Therefore, the cut-off issues are identical. Both proposals were advanced prior to the filing of the WAHQ application, and WAHQ is not entitled to cut-off protection *vis a vis* either proposal. Further, to the extent the Commission views the counter-proposal as containing an improper upgrade of either the Culebra or Frederiksted allocation, Arzuaga requests that the upgrade be eliminated - so that the proposal would be for Ch. 298A at Culebra and Ch. 293B1 at Frederiksted (or such other class channel as the Commission deems appropriate) - and Arzuaga affirms that he will accept whatever class of channel the Commission specifies so as to conform with its policies and will promptly make application for the new channel if assigned.

Public Interest Issues

18. Contrary to the assertions made by IBC, there are substantial public interest benefits to the proposed allotment of a second FM service at Culebra in addition to a third local FM service at Frederiksted. The Commission's Sixth Report on Television Allocations, Vol 1, Part 3, Rad. Reg. (P&F) 91.601, 91.620 (1952), which carried out the mandate of 47 USC 151 and 307(b), established five priorities for channel allocation: (1) a first service to all parts of the country; (2) a local station in each community; (3) a choice of two services to all parts of the country; (4) two stations in each community; and (5) additional stations based on population, location and number of services available. Thus, the proposed Culebra allocation fits within the primary objectives of Section 307(b) of the Act. As further discussed on the third page of the attached Engineering Statement, the Arzuaga proposal will also serve the public interest by providing an additional emergency outlet to this area which is prone to the devastation of hurricanes. High-power

FM stations can often provide the only emergency information available to remote islands affected by such storms, making the addition of such services vital to emergency planning for the region.

19. In contrast, WAHQ's argument regarding dial position, an argument which the Commission has repeatedly rejected over the years, has no merit whatsoever. The proposal is to move WAHQ to an adjacent channel so that there is virtually no change in dial position whatever. There certainly is no persuasive merit to an argument of listener disruption to such a move. Of course, the validity to this argument is totally undermined when one takes into account the fact that IBC previously proposed this very change to the Commission. As previously discussed, IBC cannot have it both ways - that the change was in the public interest when IBC proposed it, but it is contrary to the public interest now that Arzuaga is proposing it. This argument should be seen for what it is and dismissed out of hand.

Conclusion

20. In conclusion, there is no merit whatsoever to the belated attempts advanced by IBC to overturn the Commission's ruling in the NPRM, holding IBC's application in abeyance pending the outcome of this proceeding. IBC slept on its rights, failing to even file comments in this proceeding in a timely fashion. It is without excuse because the NPRM was properly published, and the Commission was under no obligation to serve this document on IBC. The doctrine of constructive notice applies, and adequate notice was given. Moreover, IBC was in fact served with the proposal some three years ago by undersigned counsel. IBC's complaint that it did not receive the more recent service of

the counter-proposal submitted by Arzuaga is without substantive merit. The pleading was served on the person who is running the station who in turn delivered it to IBC. It is IBC's fault that it has turned control over to a person who was not responsible to pass the document along to IBC in a more timely manner. Arzuaga cannot be blamed for IBC's relinquishment of control of its facility.

21. In any event, IBC has submitted no substantive basis for its attempt to have the instant rulemaking dismissed and/or denied. The public interest will be well served by establishment of a second FM service at Culebra and a third FM service at Frederiksted. IBC can point to no countervailing public interest factors since it is able to even more effectively improve its facility from alternate locations.

WHEREFORE THE PREMISES CONSIDERED, it is respectfully requested that the Commission dismiss and/or deny IBC's above-referenced pleadings filed in this proceeding and make the proposed changes in the FM Table of Allotments.

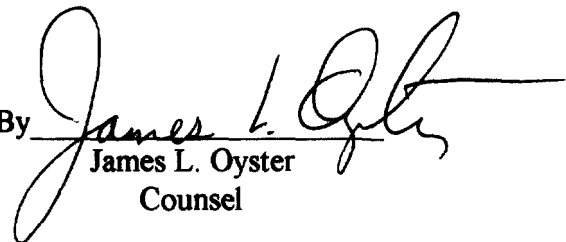
Respectfully submitted,

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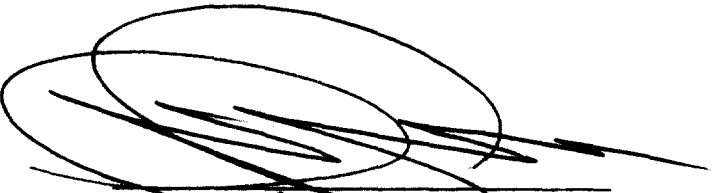
December 7, 1995

JOSE J. ARZUAGA

By 
James L. Oyster
Counsel

I, JOSE J. ARZUAGA, certify that I am a Consulting Tadio and T.V. Engineer, that my qualifications are know to the Federal Communications Commission and I prepared this statement.

I further state that calculations and exhibits contained herein were prepared by me personally or under my direction and that all facts contained therein are true of my knowledge except where stated to be on information or belief, and as those, I believe them to be true.



José J. Arzuaga
E1-01309

Date: Dic 29/95

ENGINEERING STATEMENT

The proposals for Channels 222B1, 222B and 269B made by Gureckis are entirely without basis.

The use of 222B1 is precluded in all the U.S. Virgin Islands by 7-GOLD, located in Tortola, British Virgin Islands with a power of 100 Wv. and an antenna height of 1740 ft. A.M.S.L. due to third Channel interference. For this reason the FCC changed Channel 222B, 92.3 MHz., WDCM, Cruz Bay, St. John to 267B, 101.3 MHz., due to interference it would cause to Tortola. This order was granted on September 6, 1995.

The proposed site for both 222B and 269B is not a valid site. First, from this site, shadow is cast over both service communities of Frederiksted and Christiansted. Second, its proximity to the end of the main airport runway precludes constructing a tower of sufficient height to overcome the shadow to the communities of service and third, the designated site is the Hess Oil refinery installation. Hess Oil has an extensive and lucrative installation where the antenna site is proposed. Tight security is maintained at the refinery. There is no way Hess will permit the installation of a 50 Kw. FM Antenna on its refinery chimney.

Maximum population coverage requires maximum power due to "terrain factor" in this, one of the Virgin Islands. Therefore, a reduction in class from B to B1 would be prejudicial to the public interest. For this reason Channel 293B, 106.5 MHz. is the most desirable frequency.

The petition of WAHQ to move to El Yunque is in conflict with our original proposal for Channel 298B1 for Frederiksted back in

1993; they did not take into consideration our petition which was pending in the Commission.

WAHQ, formerly WVOZ-FM, Carolina has been 27 years in the same site, since its foundation, which site is the Darlington Building, Rio Piedras, Puerto Rico. WAHQ previously obtained construction permits for sites near El Yunque on two occasions, and these were permitted to expire.

Culebra is an isolated island about 20 miles East of Puerto Rico. Channel 298B1 is the only available Channel for Culebra. Before denying Culebra its second outlet which would be in the public interest, WAHQ has available alternatives: La Marquiza Antenna Farm in Aguas Buenas, Puerto Rico and La Santa Antenna Farm in Guayama, Puerto Rico. Since El Yunque is at the extreme Northeastern end of Puerto Rico, most of the signal, is lost over water. Another factor is that El Yunque is a national park with strict environmental restrictions and a haven for protected plant and animal species. To obtain a construction permit here would be a long, difficult process. This situation does not prevail at the two antenna farms, La Marquiza and La Santa.

The advantage of moving to La Santa Peak over moving to El Yunque is considerable. The 1 millivolt 60 db contour extends westward to include the following municipalities with their respective populations, as seen in Exhibits A which list municipalities and Exhibits B which is the contour map. This is a population gain of 355,056 to the West and a loss of 1,542 to the East due to the island of Culebra falling outside of the 1 millivolt contour. A net gain of 353,514 is thus achieved.

The islands to the East of the main island of Puerto Rico, Vieques and Culebra together with the U.S. Virgin Islands of St. Croix, St. John and St. Thomas are uniquely situated surrounded by the Caribbean Ocean. Surface and air transit is usually simple as is so radio and telephone communications.

However, from time to time these islands become truly isolated. This took place in 1985 when Hurricane Hugo struck the islands. This was repeated this year with Madeline. In both occasions these population groups were completely devastated and lost all transportation and communication facilities for a time. Under these circumstances, radio communication that would extend out to encompass other islands was essential. In this, situation commercial FM stations were some of the first to return to service.

The ability of these FM stations to be able to extend their coverage to include neighboring islands is vital and can be of a life-saving nature. Therefore, it is very much in the public interest that in Frederiksted Channel 298B1 be upgraded to 293B and Channel 299A be upgraded to 293B, thus providing communication with the other islands of St. John and St. Thomas as well as improved communication within the island.

Culebra Channel 298A being able to upgrade to 298B1 is better able to encompass Vieques and St. Thomas. These upgrades thus are of tremendous benefit particularly in hurricane situations which are frequent in this area.

EXHIBITS (A)

PUERTO RICO 1990 POPULATIONS TOTALS

BARCELONETA	-	20,947
FLORIDA	-	8,689
UTUADO	-	34,980
JAYUYA	-	15,527
ADJUNTAS	-	19,451
PERUELAS	-	22,515
PONCE	-	187,749
JUANA DIAZ	-	45,198
		<hr/>
SUB-TOTAL		355,056
*CUIEBRA		- 1,542
		<hr/>
**TOTAL POPULATION		353,514
GAIN OF		
LA SANTA SITE		

TITLE: La Santa Peak
Channel 300 - 107.9 Mhz.

Lat 18 06 48
Long 66 03 07

Call City of License	Latitude Longitude	Type	Freq.	R-KM (R-M)	D-KM (D-M)	Margin
WCMN-FM	18-14-52	B	297B	74	85.63	Clear
Arecibo	66-48-43		107.3	(46)	(50.72)	
Proposed	18-18-18	B1	298B1	71	82.03	Clear
Culebra	65-18-06		107.5	(44)	(50.97)	

18° 30' N
118° 30' W

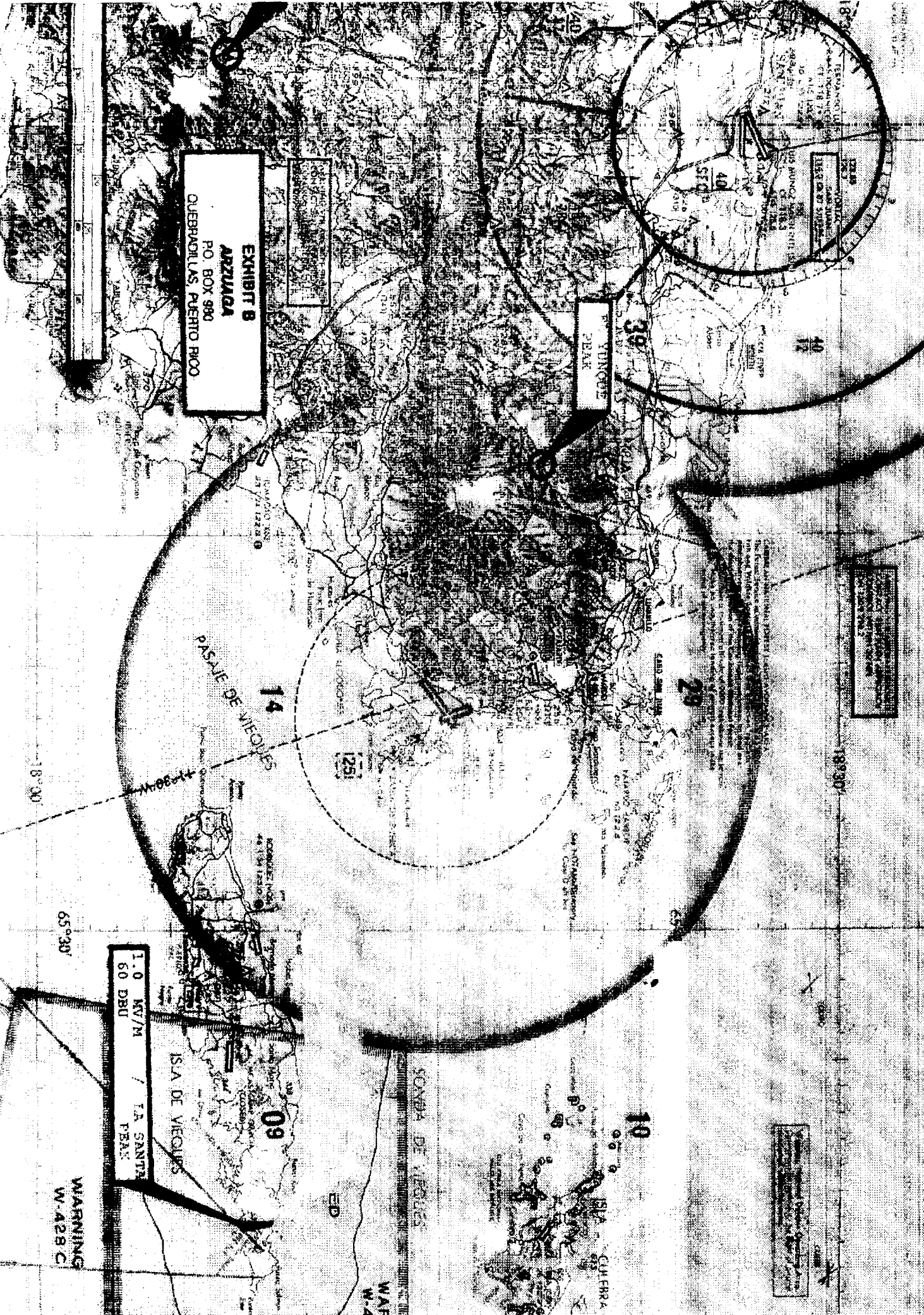
18° 30' N
118° 30' W

18° 30' N
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18° 30' N
118° 30' W



F U E R T E S R I C C O

20 000 MILES

UNITED STATES DEPARTMENT OF THE ARMY
ENGINEERING CENTER
WASHINGTON, D.C. 20315

18°30'

35

LA SANTA
PEAK

LA SANTA
PEAK

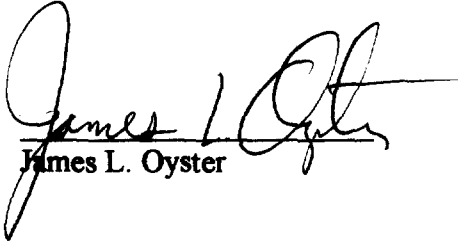
LA SANTA
PEAK



CERTIFICATE OF SERVICE

James L. Oyster hereby certifies that he has sent a copy of the foregoing by first class U.S. mail, postage prepaid, or by hand delivery, on or before the 7th day of December, 1995 to the following:

Nora E. Garrote
Piper & Marbury L.L.P.
1200 19th Street, N.W.
Washington, D.C. 20036


James L. Oyster